

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KTB OIL CORPORATION.,

Plaintiff,

Case No. 08 Civ 00584 (LAP)

- against -

ORAM TANKER LTD.

Defendant.

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**EMERGENCY MOTION UNDER RULE E(4)(f) OF  
THE SUPPLEMENTAL RULES FOR CERTAIN  
ADMIRALTY AND MARINE CLAIMS AND LOCAL  
ADMIRALTY RULE E.1 FOR AN EXPEDITED  
HEARING AND VACATUR OF  
PLAINTIFF'S MARITIME ATTACHMENT**

**S I R S :**

**PLEASE TAKE NOTICE THAT**, upon the accompanying memorandum of law, the Declaration of James D. Kleiner dated June 29, 2008, the Declarations of Roberto Dip dated June 29, 2008 and Dae-Kyun Jeong dated June 27, 2008, and all the exhibits thereto, non-party Bauche Energy S.A. will move this Court before the Hon. Loretta A. Preska, United States District Judge, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York on June 30, 2008 at 9:15 a.m. for an Order pursuant to Rule E(4)(f) of the Supplemental Rules for Certain Admiralty and Marine Claims of the Federal Rules of Civil Procedure and Local Rule E.1 vacating the attachment of funds being held by BNP Paribas due to the Order of Attachment in this

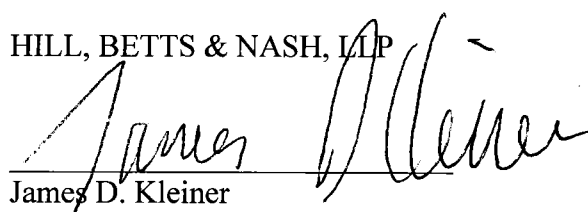
action dated January 24, 2008 and granting such other and further relief as the Court  
deems just and proper.

Dated: June 29, 2008  
New York, NY

Yours,

HILL, BETTS & NASH, LLP

By:

  
James D. Kleiner  
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Attention: Jeanne-Marie D. Van Hemmen  
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